

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	No. 4:17 CR 234 RLW/DDN
)	
MOHAMMED ALMUTTAN,)	
)	
Defendant.)	
)	

**GOVERNMENT’S RESPONSE TO DEFENDANT’S MOTION TO MODIFY
CONDITIONS OF RELEASE**

Comes now the United States of America, by and through its attorneys, Jeffrey B. Jensen, United States Attorney for the Eastern District of Missouri, and John J. Ware, Assistant United States Attorney for said District, and responds to defendant’s motion to modify conditions of release as follows:

Defendant moves the Court to modify the conditions of his bond by the removing of global positioning system (GPS) tracking. The Government is adamantly opposed.

Defendant claims that it is difficult to maintain his busy work schedule and impossible to respond to emergencies arising at his convenience stores. Instead of seeking slight alterations with his probation officer as to daily travel limitations, defendant seeks removal of the only device which limits his ability to flee the country. Prior hearings have established his connections to, and wealth in, Palestine.

The fact that defendant’s current motion seeks a non-commensurate modification to the underlying issue and is made simultaneously with his three co-defendant brothers (not all of

whom have multiple store duties) suggests either an insincere motive or an attempt to seek an extreme position in an effort to bargain for the desired outcome.

As such the Government opposes defendant's motion, however, believes there are several, significantly less drastic actions that would address defendant's complaints which it would support.

WHEREFORE, the Government opposes defendant's motion for removal of GPS as a condition of bond.

Respectfully submitted,

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United States Attorney

/s/ John J. Ware

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CERTIFICATE OF SERVICE

I hereby certify that on March 23, 2018, the foregoing was filed electronically with the Clerk of Court to be served by operation of the Court's electronic filing system upon all counsel of record.

/s/ John J. Ware

JOHN J. WARE, #40880MO

Assistant United States Attorney